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October 6, 2020

Via Priority Express Mail

Prince George's County Police Department
8801 Police Plaza, 4th Floor
Upper Marlboro, MD 20772

Re: Bahram Shakeri v. Prince George's County Police Department

2020 OCT 14 AM 10:33

RECEIVED
OFFICE OF LAW

To Whom It May Concern:

Please be advised that this firm represents Mr. Shakeri regarding his claims of your Department's gross negligence which resulted in Mr. Shakeri's invasion of privacy and damages based on the publication of defamatory statements against Mr. Shakeri. Mr. Shakeri has retained our firm to attempt resolution of his claims confidentially prelitigation at this juncture before protracted litigation sets in. This is the second letter that we are writing in hopes of getting a resolution to this matter as we have not received any response from our previous attempts at correspondence.

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After careful review of the facts and circumstances surrounding his claims, we believe Mr. Shakeri has a significant case for damages caused by the negligence and publication of defamatory statements of officers from the Prince George's County Police Department. In that this matter is currently at the prelitigation stage and neither formal discovery nor further investigation has occurred, we reserve the right to supplement these facts as formal investigation may dictate. Further, this communication is subject to Maryland Evidence Rule 5-408 and therefore is not admissible for any reason.

By way of background, On or about January 21, 2020, Mr. Shakeri was in MGM National Harbor when Delonte West attacked him for the first time. Mr. Shakeri tried to get away to calm the situation down, but he was followed. Then when he tried to leave, Mr. West continued to attack and harass. Finally, a fight broke out near the 6700 block of Oxon Hill road. Mr. West threw a glass at my client's head. It was only then that Mr. Shakeri in self-defense took action against Mr. West. Bystanders who were witnessing the altercation took video and placed it on social media, where Mr. Shakeri can be clearly seen and has been recognized by numerous individuals. Once Mr. West was detained by police, video was taken by an officer where Mr. West stated that Mr. Shakeri "approached him with a gun". That video was taken and released to TMZ by an officer of the Prince George's County Police Department. As

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stated by Chief Hank Stawinski, "It [was] irresponsible for that [video], taken by a Prince George's County police officer, to be in the public's hands...".

Based on investigation of witnesses done at the scene by the Prince George's County Police Department, officers were fully aware that Mr. Shakeri did not approach Mr. West with a gun, and that it was, in fact, Mr. West who instigated the altercation. Despite this knowledge, an officer of the Prince George's County Police Department published the video footage of Mr. West's defamatory statements to the public by releasing the video to TMZ.

As a result of your Department's gross negligence and publication of defamatory statements, Mr. Shakeri has been severely damaged.

We are prepared to move forward and seek all available remedies on Mr. Shakeri's behalf. To that end, we demand that you preserve all documents, including but not limited to, personnel files, emails (both external and internal communications), text messages, photos, video footage, and digital recordings regarding Mr. Shakeri. However, we have asked Mr. Shakeri to attempt an out-of-court resolution before the protracted nature and emotions of litigation set in. If you are interested in resolving this matter and furthering discussion in this regard, please contact us within fourteen (14) days of receiving this letter. If we have not heard from anyone within this timeframe, we will assume

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you are not interested in resolving this matter out of court and will take immediate steps to move forward on Mr. Shakeri's behalf.

We hereby reserve Mr. Shakeri's rights at law and in equity.

Sincerely,



Faisal Gill

cc: Rhonda L. Weaver
Prince George's County Attorney
1301 McCormick Drive
Suite 4100
Largo, MD 20774